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Attorneys for Lead Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ROBERT CRAGO, Individually And On Behalf
Of All Others Similarly Situated,

Plaintiff,

v.

THE CHARLES SCHWAB CORPORATION,
CHARLES SCHWAB & CO., INC., CHARLES
R. SCHWAB, and WALTER W. BETTINGER
II,

Defendants.

Case No. 3:16-cv-3938-RS

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME TO
FILE AMENDED COMPLAINT**

1 Lead Plaintiffs Robert Wolfson and Frank Pino (“Lead Plaintiffs”) and Defendants The
2 Charles Schwab Corp., Charles Schwab & Co., Inc., Charles R. Schwab, and Walter W. Bettinger II
3 (“Defendants”), by and through their respective counsel, have met and conferred and hereby
4 stipulate as follows:

5 WHEREAS, pursuant to a stipulated order entered by the Court on November 18, 2016
6 (ECF No. 41), Lead Plaintiffs’ amended complaint is due January 13, 2017;

7 WHEREAS, due to the recent illnesses of certain attorneys handling the case for Co-Lead
8 Counsel, Lead Plaintiffs sought Defendants’ consent to a one-week extension of time to file the
9 amended complaint;

10 WHEREAS, Lead Plaintiffs and Defendants have met and conferred about extending all
11 deadlines previously stipulated to in this action by one week and the parties mutually agree, with the
12 Court’s approval, that the new deadlines shall be as follows:

13	January 20, 2017:	Lead Plaintiffs Filing Amended Complaint
14	March 10, 2017:	Schwab’s Motion to Dismiss
15	April 21, 2017:	Lead Plaintiffs’ Opposition to Schwab’s Motion
16	May 19, 2017:	Schwab’s Reply

17 WHEREAS, the parties further agree that in light of the foregoing circumstances and in the
18 interest of judicial efficiency, administration and justice, as well as conservation of judicial and
19 private resources, the Initial Case Management Conference should be continued until after the Court
20 has decided Schwab’s motion to dismiss and there is an operative complaint on file; and

21 WHEREAS, this is the parties’ first request for an extension of any deadline in this case.

22 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO**
23 **APPROVAL BY THIS COURT**, by these parties through their respective counsel of record, as
24 follows:

- 25 1. Lead Plaintiffs’ deadline to file a new complaint will be January 20, 2017;
 - 26 2. Schwab’s deadline to file its motion to dismiss will be March 10, 2017;
- 27
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1 3. Lead Plaintiffs' deadline to file its opposition to Schwab's motion will be
2 April 21, 2017;

3 4. Schwab's deadline to file its reply to its motion will be May 19, 2017;

4 5. The initial case management conference and all accompanying deadlines will be
5 continued until after the Court decides Schwab's motion to dismiss and there is an operative
6 complaint on file; and

7 6. The parties do not seek to reset these dates for the purpose of delay. The proposed
8 new dates will not have an effect on any pre-trial and trial dates as the Court has yet to schedule
9 these dates.
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11 SO STIPULATED.
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1 Dated: January 12, 2017

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Co-Lead Counsel for Lead Plaintiffs and the Class

20 Dated: January 12, 2017

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Attorneys for Defendants

ATTESTATION

I, Joshua L. Crowell, am the ECF User whose identification and password are being used to file this Proposed Order of Consolidation. In compliance with Local Rule 5-1(i)(3), I hereby attest that Co-Lead Counsel for Plaintiffs, Robert Wolfson and Frank Pino, concurs in this filing.

DATED: January 12, 2017

/s/ Joshua L. Crowell
JOSHUA L. CROWELL

~~PROPOSED~~ ORDER

Based on the parties' stipulation and the good cause described therein, the Court GRANTS this stipulation. The following schedule shall apply:

January 20, 2017:	Plaintiffs' Deadline To File A New Complaint
March 10, 2017:	Schwab's Deadline To File A Motion To Dismiss
April 21, 2017:	Plaintiffs' Deadline To File An Opposition to Schwab's Motion
May 19, 2017:	Schwab's Deadline To File Reply

The Court orders that the initial case management conference and all accompanying deadlines will be continued until after the Court decides Schwab's motion to dismiss;

IT IS SO ORDERED.

DATED: 1/12/17



Hon. Richard Seeborg
U.S. District Court Judge